

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:  
Robert Bernard Stein : Case No. 20-20666-CMB  
: Chapter 13  
Debtor(s) :  
Wilmington Trust, National Association, :  
not in its individual capacity, but solely : Related to Document #17  
as Trustee for MFRA Trust 2014-2 :  
Movant(s) :  
: Hearing Date: 4/29/20 at 11:00 a.m.  
vs. :  
Robert Bernard Stein :  
Respondent(s) :

CHAPTER 13 TRUSTEE'S RESPONSE TO MOTION OF  
WILMINGTON TRUST, NATIONAL ASSOCIATION'S RELIEF FROM STAY

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,  
respectfully represents the following:

1. Wilmington Trust, National Association. requests relief from stay with regard to the property located at 1502 Jennifer Court.
2. Local Rule (W.PA.LBR) 9013-3(a) contains a list of what must be pled in a motion seeking relief from stay. Among other items in the list, the Local Rule requires the movant to plead: (a) the value of any affected property and the source of the valuation (L.R. 9013-3(a)(3)); and (b) the current balance (inclusive of principal, interest, interest rate, charges, costs, fees, and accruing daily interest) (L.R. 9013-3(a)(6)).
3. Without an allegation of the value and balance due it is impossible to determine if there is adequate protection as a result an equity cushion, or more significantly from the Trustee's perspective, whether the property has value for the estate. It does not appear that the movant plead either a value for the property or current balance due.

4. Although it appears unlikely there is equity in this case, the Court and Trustee need not be forced to guess at the relevant facts required by local rule.

WHEREFORE, the Trustee respectfully requests that the Motion be denied.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: April 17, 2020

By: /s/ Owen W. Katz  
Owen W. Katz, PA I.D. 36473  
Attorney for Chapter 13 Trustee  
U.S. Steel Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
Email: [okatz@chapter13trusteewdpa.com](mailto:okatz@chapter13trusteewdpa.com)

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CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> of April 2020, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Office of the United States Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222-3721

Albert G. Reese, Jr., Esquire  
640 Rodi Road, 2<sup>nd</sup> Floor, Suite 2  
Pittsburgh, PA 15235

Robert Bernard Stein  
Melissa L. Stein  
1502 Jennifer Court  
Irwin, PA 15642

Kaitlin Shire, Esquire  
777 Township Line Road, Suite 250  
Yardley, PA 19067

/s/Rosa Richard  
Office of Chapter 13 Trustee  
U.S. Steel Tower – Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
(412) 471-5566  
cmecf@chapter13trusteedpa.com